

## AT&T Comments on the Disposition Report for KPMG Exception 49

### Summary of

**Recommendation:** KPMG should not close Exception 49. KPMG should continue to re-test using the new WEB-Verigate interface. KPMG's expertise in testing should be employed to evaluate the WEB-Verigate interface, specifically including an examination of whether the problems found in the WEB-LEX GUI have been corrected.

In conducting its Transaction Validation and Verification Test 1 (TVV1), KPMG found that Ameritech's system returned Firm Order Confirmations ("FOCs") late when the orders were submitted through the WEB-LEX graphical user interface ("GUI") and the FOCs were manually processed. KPMG presented its test records to Ameritech showing a systematic pattern of significant lateness in providing the test CLEC with the necessary FOCs. KPMG noted the impact of late FOCs in its Exception report.

Late responses returned by Ameritech's WEB-LEX GUI system will prevent CLECs from servicing their customers in a timely manner.

Ameritech in response has not refuted the validity of the KPMG finding, but claims that the reason for the late FOCs is "manual processing errors and data outages." Ameritech has not provided any explanation of the term "data outage." Manual processing errors appear to relate to Local Service Center ("LSC") personnel processing the order into the Ameritech system and preparing the FOC transactions. Ameritech insisted in its March 20 and April 10, 2002 responses that no re-testing of the systems is necessary, ostensibly because no changes are being made to the Ameritech systems or operations that would provide timely FOCs to the test-CLEC and ultimately to CLECs that submit such orders in production and receive the manual FOCs.

AT&T's experience in receiving FOCs for orders submitted through the WEB-LEX GUI are consistent with KPMG's findings. Over the six-month period of October 2001 through March 2002, AT&T experienced only three months in which it received FOCs for electronically submitted orders within the 95% on-time benchmark and only two months where its TCG orders received timely provision of the FOCs. The CLEC Aggregate results for these same six months tracks with AT&T's results. There are only three months where timely FOC returns have been experienced. In March 2002, CLECs experienced the lowest results; Ameritech returned FOCs on time just over 70% on time based on a total of 25,000 order confirmations.

Ameritech has requested that no retesting be conducted for this Exception and KPMG has indicated it plans no further activities related to this Exception. Therefore, as this Exception is closed, there remain several outstanding concerns: First, there can be no dispute that Ameritech has not remedied the underlying problems that resulted in the Exception being issued. Both KPMG's and AT&T's data and experience confirm this.

Second, Ameritech has now "retired" the WEB-LEX GUI (which is the subject of Exception 49) and replaced it with the WEB-Verigate GUI. This "upgrade" occurred in April 2002 in conjunction with its "uniform" systems release. AT&T has been advised by KPMG that no further testing of the Ameritech GUI pre-ordering and ordering interfaces will take place after the implementation of the WEB-Verigate GUI. KPMG's explanation for abandoning such testing (or re-testing)<sup>1</sup>, is that the OSS Testing project plan it has developed with the Commission Staff was based on an assumption that the TVV1 testing via the GUI would have been completed well in advance of the implementation of WEB-Verigate, and that implementation of the WEB-Verigate by the test-CLEC would have been unnecessary. The

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<sup>1</sup> As of April 23, 2002, there are 11 unresolved Exceptions and 5 unresolved Observations involving the GUI. It is not clear what retesting will be possible for these test failings.

Commission Staff has not ordered a change to the MTP to provide for testing of the WEB-Verigate interface.

AT&T does not believe that this approach (as explained by KPMG) is consistent with the MTP and the parties' collaborations in preparation of the MTP. AT&T believes that when the industry collaborated to develop the MTP<sup>2</sup> the participants anticipated the potential for such delays caused by Ameritech's inability to pass the TVV1 military style tests. The MTP clearly states as an objective of the test at Page 3:

The test will be conducted using the most current release of Ameritech business rules documentation.

In other words, the MTP reflects AT&T's belief that testing and re-testing would continue without regard to a change in OSS "release" and that the MTP requires that KPMG's final report be based upon the "current release" of Ameritech's business rules documentation.<sup>3</sup> The MTP does not authorize KPMG or the Commission staff to refrain from testing or re-testing simply because an operational release of a certain portion of OSS is replaced by an updated release.<sup>4</sup> Rather, as the MTP plainly states:

The test is expected to be conducted using a "test until pass" approach. This is believed to be in the best interest of all parties seeking an open, competitive market for local telephone services in Michigan.

If no further GUI pre-ordering and ordering testing is to take place, the problems found by KPMG will not be resolved through retesting and problems, if any, experienced by CLECs

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<sup>2</sup> State of Michigan Public Service Commission Ameritech OSS Evaluation Project Master Test Plan; Version 2; August 14, 2000

<sup>3</sup> For example, there is no mention in the "Limitations" section of the MTP relating to the cessation of testing due to the replacement or upgrading of an interface. *See* MTP, pp.7-8.

<sup>4</sup> Only the Commission may relieve KPMG from an obligation to retest: "KPMG Consulting and MPSC will be responsible for determining when to close an Exception. If the issue raised by the Exception is not resolved, the cycle will continue to iterate until closure is reached, no further action is warranted, or the MPSC specifically exempts the Exception from further testing." MPT, p. 6. In this case, AT&T would strenuously dispute that "no further action is warranted" considering that a new and completely untested WEB GUI will be implemented.

using the new WEB-Verigate interface will not be identified and corroborated by KPMG. KPMG's expertise in testing should be employed to evaluate the WEB-Verigate interface, specifically including an examination of whether the problems found in the WEB-LEX GUI have been corrected.